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From: Diane Golden [mailto:degolden@swbell.net]

Sent: Monday, July 07, 2003 3:28 PM

To: Pam Gregory

Cc: Jenifer Simpson, Thomas Chandler

Subject: More on CapTel

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Federal Communications Commission
Office of the Secretary

Pam The more we get into this the more problematic it becomes. We think we've confirmed that the CapTel CPE will be sole source only (through WCI which is pretty much a subsidiary of Ultratec) Thus as a state distribution program, we would have to enter into a sole source contract which leaves us little room for cost containment. The retail cost of the phone will be about \$500 and the cost to state programs will be about \$400. In gathering this info, we were also informed that the FCC was ready to issue approval of CapTel as an enhanced VCO service any day now -- so thought I'd get all of our concerns into you

As mentioned previously, CapTel bundles consumer premises equipment (CPE) with a type of relay service using a single provider for each. Ultratec/WCI provides the CPE and Sprint provides the relay service. This creates a monopoly or sole source situation when neither seems to be inherently proprietary. Voice recognition software to deliver speech to text translation and automatic connection of outgoing calls to a relay service are both services other relay providers could offer based on existing software systems. Such services could also be delivered through other CPE and could benefit other types of relay calls such as TTY calls. In my mind this is no different than someone deciding to use text to speech software to enhance TTY calls and bundling that with a Panasonic CPE and saying the only way you can use that relay enhancement is with that phone when many others could also do the job. (I realize text to speech is not much of an advantage with the written ASL used by many TTY users, but just used that as an example of the bundling problem)

The bundling of this relay service with one CPE leads to obvious concerns about cost effectiveness and accountability. With only one provider of the CPE, states wanting to offer the enhanced service would be compelled to enter into a sole source agreement to be able to deliver the equipment with no control over cost. Consumers not eligible for state programs, or living in states without an equipment program would be forced to purchase one specific company's equipment or not be able to access the enhanced service. Also, states using a relay provider other than Sprint would seem to have a problem in being able to offer the service.

This all raises concern about providing an enhanced relay service to one disability group, specifically those with hearing loss and good speech, while leaving out other potential beneficiaries. If faster speech to text translation is provided using voice recognition software, this enhancement should not be limited to only those individuals who have the CapTel CPE. It is an enhancement that should be available to all consumers who can benefit.

Thus if CapTel is considered to be enhanced VCO, we would recommend that it be offered for all relay users who can benefit and should be available through more than one CPE. It should also

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be provided just as other relay services are 24 hours a day, 7 days a week, with emergency access provisions. If the service cannot be provided at this level, it should stay in trials until the service level becomes adequate.

Lastly, it would be really helpful to have an independent evaluation of both the CapTel service and CPE. It's a little disconcerting to have the only evaluative data collected and analyzed by Ultratec/Sprint. Also, evaluative questions to date seem to focus on the service rather than the CPE. Since CapTel is being marketed as a solution for hard of hearing individuals who have been amplified phone users (not VCO users) in the past, it would seem appropriate to structure a number of questions around the relative effectiveness and comparative usefulness of the CapTel to amplified phone usage.

Again, hope you can route these thoughts to the appropriate individuals at the FCC.

Thanks,
Diane

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